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22 Attorneys for Third-Party  
23 WIKIMEDIA FOUNDATION, INC.

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

J. A. CASTRO,

Plaintiff,

v.

JOHN DOE 1 a/k/a CHETSFORD,

Defendant.

Case No. 3:23-mc-80198-TSH

**DECLARATION OF JOE  
SUTHERLAND IN SUPPORT OF  
DEFENDANT WIKIMEDIA  
FOUNDATION, INC.'S OPPOSITION  
TO PLAINTIFF'S MOTION TO  
COMPEL**

Judge: Magistrate Judge Thomas S. Hixson

1 I, Joe Sutherland, declare as follows:

2 1. I am Lead Trust and Safety Specialist at Wikimedia Foundation, Inc.  
3 (“Wikimedia”). I understand that this Declaration is being submitted in support of  
4 Wikimedia’s Opposition to the Plaintiff’s Motion to Compel. I have personal  
5 knowledge of the following and, if called as a witness, could and would testify  
6 completely thereto.

7 2. In my current role, I have knowledge of Wikipedia’s mission, privacy  
8 policy, and operations, as well as how users can, and do, interact with Wikipedia.

9 3. Wikimedia is a nonprofit charitable organization based in San  
10 Francisco, California.

11 4. Wikimedia hosts over a dozen free knowledge projects, including  
12 Wikipedia, the world’s largest and most popular encyclopedia.

13 5. Wikipedia is a web-based, free-content encyclopedia that contains more  
14 than 61 million volunteer-authored articles in over 300 languages. It is written,  
15 edited, and curated by users who, if they choose, may remain anonymous.  
16 Wikipedia’s editors are largely anonymous or pseudonymous Internet volunteers  
17 who do so without pay.

18 6. The Wikipedia project is largely self-administered. The policies and  
19 guidelines for Wikipedia are developed by the community of Wikipedia users  
20 themselves.

21 7. Wikimedia and the Wikipedia community is committed to allowing  
22 editors their choice to remain anonymous or pseudonymous. Users can contribute  
23 anonymously, under a pseudonym, or, if they choose to, with their real identity.

24 8. Anonymity is a tenet of the Wikimedia Foundation Privacy Policy,  
25 which is applicable to the Wikipedia project: “We [Wikimedia] believe that you  
26 shouldn’t have to provide nonpublic Personal Information to participate in the free  
27 knowledge movement. You do not have to provide things like your real name,  
28 address, or date of birth to sign up for a standard account or contribute content to the

1 Wikimedia Sites.” The Privacy Policy is available at  
2 [https://foundation.wikimedia.org/wiki/Policy:Privacy\\_policy](https://foundation.wikimedia.org/wiki/Policy:Privacy_policy).

3 9. Except in limited cases where editing is restricted to prevent disruption  
4 or vandalism to articles, anyone with Internet access can create, write, or make  
5 changes to Wikipedia articles. These users are known as “unregistered users” or “IP  
6 users.”

7 I declare under penalty of perjury that the foregoing is true and correct to the  
8 best of my knowledge. Executed on August 14, 2023, in San Francisco, California.

9  
10 /s/ Joe Sutherland

11 Joe Sutherland  
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